

Gentlemen,

I am writing in reply to the recent request on 99-325 by Mr. John Wells King of Garvey Schubert Barer to have IBOC allowed at night. Sirs, I am taking this opportunity to request as a end user that this NOT be allowed.

I live in Missouri, some 300 miles from WLW. testing that has been done with IBOC. I have had interference from the digital sidebands that cause me loss of service and difficulty in hearing regularly heard stations at my home. At present, although the interference, which sounds like rushing water on each side of the center frequency which is testing, it can be heard here.

Not only is the interference with United States stations, it also interferes with international frequencies. In the early December testing with WLW running IBOC, I was unable to listen to the African-American-oriented gospel music broadcast by KSTL East St. Louis, IL on 690 kHz, 17 miles southeast of my location.

During the later testing between WLW and WOR, considerable interference was noted between WLW's IBOC sidebands and WOR New York. In fact, the sidebands wiped out all reception on 710. This would cause secondary listeners, in a case of national emergency such as occurred on 9/11, would be rendered unable to retrieve information concerning the emergency. The same would be if there was an EAS message to be broadcast. The general public uses analog radio and the interference would possibly cause many listeners to be rendered unable to receive life saving notifications because of an increased noise floor due to the sideband digital transmission.

In the petition on page 3 its noted "...computer models and field tests have shown that night time use of the AM IBOC system can in certain instances, lead to intolerable levels of interference..." If this interference is going to be intolerable in many cases, at least extrapolating what could be from what I have heard, then why cause the public to lose their service and notification of emergencies in any case?

With the significant skywave that is observed on MW frequencies, I am of the opinion that digital will not work well, especially in the hybrid IBOC mode and will be destructive to the AM analog band in a way that will cause listeners to flee to other bands or entertainment venues.

I disagree with the petition on page 4 that states, "...the number of stations which would cause interference is small." I believe that all stations not running IBOC would receive detrimental interference if I can hear the sidebands on the other side of the country from the testing. This interference has been noted also in California.

It is for this reason that I believe that even the digital stations would interfere with one another in the IBOC hybrid mode.

I would like to see further testing with several adjacent frequencies with stations such as 1110 KFAB, 1120 KMOX,

1130 KFAN, or some such clustered arrangement be tested. Furthermore until testing is done with 8 or so stations on a graveyard frequency such as 1230 and 1240 clustered in a fairly close proximity, then the true effect of IBOC will not be understood.

Its for the reason that I feel testing is not only complete, but I believe that real world testing has not even been accomplished, that I am against the night time use of IBOC on MW frequencies, not only at this time, but at any time. I favor a permanent ban on all IBOC transmissions, not only on AM, but also on FM. The FCC should also consider allowing tests with the European-developed DRM (Digital Radio Mondiale) system on the AM broadcast band; DRM has been approved for AM, Longwave and Shortwave in the rest of the world.

Thank you for your time in this matter.

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